

1 PHILLIP A. TALBERT
2 Acting United States Attorney
3 KEVIN C. KHASIGIAN
4 Assistant United States Attorney
5 501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

5 Attorneys for the United States

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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$37,000.00 IN
U.S. CURRENCY,

15 Defendant.

2:20-MC-00314-TLN-DB

16

17 STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

18 It is hereby stipulated by and between the United States of America and potential claimant Kera
Barber (“claimant”), by and through their respective counsel, as follows:

19 1. On or about September 25, 2020, claimant filed a claim in the administrative forfeiture
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
21 \$37,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on July 24, 2020.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim
25 to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
2 That deadline was December 24, 2020.

3 4. By Stipulation and Order filed December 17, 2020, the parties stipulated to extend to
4 February 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
6 to forfeiture.

7 5. By Stipulation and Order filed February 12, 2021, the parties stipulated to extend to March
8 24, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. By Stipulation and Order filed March 23, 2021, the parties stipulated to extend to May 24,
12 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
14 forfeiture.

15 7. By Stipulation and Order filed May 20, 2021, the parties stipulated to extend to June 23,
16 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
18 forfeiture.

19 8. By Stipulation and Order filed June 22, 2021, the parties stipulated to extend to August 23,
20 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
21 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
22 forfeiture.

23 9. By Stipulation and Order filed August 19, 2021, the parties stipulated to extend to October
24 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
25 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
26 forfeiture.

27 10. By Stipulation and Order filed October 21, 2021, the parties stipulated to extend to
28 November 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
2 to forfeiture.

3 11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
4 December 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
6 to forfeiture.

7 12. Accordingly, the parties agree that the deadline by which the United States shall be required
8 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
9 the defendant currency is subject to forfeiture shall be extended to December 22, 2021.

10 Dated: 11/19/21

PHILLIP A. TALBERT
Acting United States Attorney

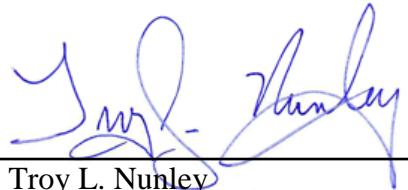
12 By: /s/ Kevin C. Khasigian
13 KEVIN C. KHASIGIAN
14 Assistant United States Attorney

15 Dated: 11/19/21

16 /s/ Jacek Lentz
17 JACEK LENTZ
18 Attorney for potential claimant
19 Kera Barber
20 (Signature authorized by email)

21 **IT IS SO ORDERED.**

22 Dated: 11/19/2021



23 Troy L. Nunley
24 United States District Judge